U.S. BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re DAVID & CHERYL LABS : CHAPTER 13

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Debtor(s) : BANKRUPTCY NO. 19-16191

OBJECTION TO CERTIFICATION OF DEFAULT

Debtor(s), David and Cheryl Labs, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by Metropolitan Life Insurance Company on April 3, 2023. Debtors modified their loan which was approved by this Court on May 25, 2022 (Docket No. 75). As such the delinquency alleged is inaccurate and Debtors believe they can become current on all post-petition payments due under the October 8, 2020 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young PAUL H. YOUNG, Esquire Young, Marr & Associates 3554 Hulmeville Road, Suite 102 Bensalem, PA 19020 P: 215-639-5297 F: 215-639-1344 support@ymalaw.com

Dated: April 4, 2023